

# ***EXHIBIT 27***



1 MI FAMILIA VOTA, et §  
 2 al., §  
 3 Plaintiffs, §  
 4 v. § Case No. 5:21-cv-0920-XR  
 5 §  
 6 GREG ABBOTT, et al., §  
 7 Defendants. §

8  
 9 ORAL AND VIDEOTAPED DEPOSITION OF

10 RACHELLE OBAKOJUWA

11 MARCH 21, 2023

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 15 ORAL AND VIDEOTAPED DEPOSITION OF RACHELLE

16 OBAKOJUWA, produced as a witness at the instance of the  
 17 Defendants and duly sworn, was taken in the above styled  
 18 and numbered cause on Tuesday, March 21, 2023, from  
 19 3:51 p.m. to 6:44 p.m., before DONNA QUALLS, Notary  
 20 Public in and for the State of Texas, reported by  
 21 computerized stenotype machine, at the offices of Harris  
 22 County Attorney's Office, 1019 Congress Street, 15th  
 23 Floor, Houston, Texas, pursuant to the Federal Rules of  
 24 Civil Procedure, and any provisions stated on the record  
 25 or attached hereto.

1 Q. So why do you think the rejection rate was  
2 higher in November 2022 than in the past elections shown  
3 here?

4 MS. HUNKER: Objection; form.

5 A. SB1 has brought challenges to mail voting that  
6 were not part of any of the other elections --  
7 elections.

8 MS. PAIKOWSKY: I think I am ready to pass  
9 the witness.

10 EXAMINATION

11 BY MS. HOLMES:

12 Q. Good afternoon. My name is Jennifer Holmes,  
13 and I represent the -- and now I have a microphone.

14 Good afternoon. My name is Jennifer  
15 Holmes, and I represent the HAUL plaintiffs in this  
16 case. Thank you for bearing with us today.

17 You testified earlier that your office had  
18 engaged in increased efforts to recruit election  
19 workers; is that correct?

20 A. Yes.

21 Q. And I believe you also testified that there was  
22 some relation between SB1 and difficulty in retaining  
23 election workers; is that correct?

24 A. Yes.

25 Q. And what is the relationship between SB1 and

1 the difficulty retaining election workers?

2 A. After SB1, we received a lot of phone calls  
3 from election workers that, particularly judges, that  
4 they were concerned at the way that laws were being  
5 written that make it more challenging for them where  
6 they would be concerned that they could do something  
7 wrong. And so they -- we had a lot more declines,  
8 people declining to work for those reasons.

9 Q. Okay. And specifically for the November 2022  
10 election, can you quantify the number of people that  
11 declined to work?

12 A. There were almost 600 people that declined to  
13 work, 600 judges that declined to work Election Day in  
14 November 2022.

15 Q. And do you know how many of those election  
16 judges, those 600, declined and cited reasons as part of  
17 the reason SB1?

18 A. I couldn't quantify that.

19 Q. Have any election judges who declined to work  
20 or are concerned about working communicated what  
21 specifically about SB1 raises concerns?

22 A. That poll watchers at the voting location can  
23 be a challenge to work with and that they don't know  
24 when they are doing something that would get them in  
25 trouble with a poll watcher.

1 MS. HUNKER: That description aligns with  
2 how I understood our discussion.

3 I think, then, we can close the deposition  
4 unless any of the counsel on Zoom have questions or  
5 points that they need to raise.

6 Hearing none, I think we can close it.

7 THE VIDEOGRAPHER: We are going off the  
8 record on March 21st, 2023 at 6:44 p.m.

9 (Proceedings adjourned at 6:44 p.m.)  
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